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HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LESLIE JACK, Individually and as Personal Representative of the Estate of PATRICK JACK; DAVID JACK, individually,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants.

No. 2:17-cv-00537-JLR

PLAINTIFFS' STIPULATION AND [FROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT FORD MOTOR COMPANY'S MOTION FOR SUMMARY JUDGMENT

NOTING DATE: JULY 31, 2018

Plaintiff Leslie Jack, individually and as personal representative of Patrick Jack, and David Jack, ("Plaintiffs") and defendant Ford Motor Company, hereby stipulate to an extension of time for Plaintiffs to file their Response to Ford Motor Company's Motion for Partial Summary Judgment from the current deadline of July 30, 2018 to August 6, 2018.

Ford filed its Motion on July 10, 2018. The remaining defendants all filed their summary judgment motions a week later on July 17, 2018. Per the Court's July 25, 2018 order, Plaintiffs will file one response on many of the common legal issues raised in Ford's motion and those of the other defendants. The parties file the instant stipulation to set a single deadline for that one response.

STIPULATION AND PROPOSED ORDER EXTENDING DEADLINE FOR PLAINTIFFS TO RESPOND TO FORD MOTOR COMPANY'S MOTION FOR SUMMARY JUDGMENT – 1 (Case No. 2:17-cv-00537-JLR)

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STIPULATION 1 2 Plaintiffs and defendant Ford Motor Company, by and through their respective 3 counsel of record, hereby stipulate and agree that the deadline for Plaintiffs' Response to 4 Ford Motor Company's Motion for Partial Summary Judgment may be extended from the 5 current deadline of July 30, 2018 to August 6, 2018. 6 DATED this 31st day of July, 2018. 7 DEAN OMAR & BRANHAM, LLP **FUCILE & REISING LLP** 8 9 By: s/Benjamin H. Adams By: s/Mark Fucile 10 Benjamin H. Adams, CSB No. 272909 Mark Fucile, WSBA No. 23736 Attorney for Plaintiffs Attorney for Ford Motor Company 11 12 ORDER EXTENDING DEADLINE TO RESPOND TO SUMMARY JUDGMENT 13 The Court having considered the Stipulation by the Plaintiffs and Defendant Ford 14 15 Motor Company, and being fully advised in the premises, now, therefore hereby 16 ORDERS that the deadline for Plaintiffs to file their Response to Ford Motor Company's 17 Motion for Partial Summary Judgment is extended from the current deadline of July 30, 18 2018 to August 6, 2018. The court DIRECTS the Clerk to renote Ford Motor Company's motion (DK+. #449) for August 10, 2018. 19 20 21 THE HONORABLE JAMES L. ROBART 22 Presented by: 23 DEAN OMAR BRANHAM, LLP 24 By: s/Benjamin H. Adams 25 Benjamin H. Adams, CSB # 272909 Attorneys for Plaintiffs 26

STIPULATION AND PROFUSED ORDER EXTENDING DEADLINE FOR PLAINTIFFS TO RESPOND TO FORD MOTOR COMPANY'S MOTION FOR SUMMARY JUDGMENT – 2 (Case No. 2:17-cv-00537-JLR)

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1	Approved as to form and content:				
2	FUCILE & REISING LLP				
3	By: <u>s/ Mark Fucile</u>				
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STIPULATION AND PROPOSED ORDER EXTENDING DEADLINE FOR PLAINTIFFS TO RESPOND TO FORD MOTOR COMPANY'S MOTION FOR SUMMARY JUDGMENT – 3 (Case No. 2:17-cv-00537-JLR)

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CERTIFICATE OF SERVICE 1 2 I hereby certify that on July 31, 2018, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system which will send notification of such filing to the 3 following: 4 Randy J Aliment randy.aliment@lewisbrisbois.com, annie.kliemann@lewisbrisbois.com 5 Ronald C Gardner rgardner@gandtlawfirm.com, khensley@gandtlawfirm.com 6 James Edward Horne ihorne@gth-law.com, imoservice@gth-law.com, kcalkins@gth-7 law.com 8 Kristin M Houser houser@sgb-law.com, oneil@sgb-law.com, sgbasbestos@sgb-law.com 9 Diane J. Kero dkero@gth-law.com, service@gth-law.com 10 Barry Neal Mesher (Terminated) bnm@bnmesherlaw.com 11 Michael Edward Ricketts mricketts@gth-law.com, cwallace@gth-law.com, 12 imoservice@gth-law.com, kcalkins@gth-law.com 13 William Joel Rutzick rutzick@sgb-law.com, jones@sgb-law.com, liberio@sgb-law.com, 14 ross@sgb-law.com, scrawford@sgb-law.com, ylitalo@sgb-law.com 15 G William Shaw bill.shaw@klgates.com, Janet.Lewis2@klgates.com, Ryan.Groshong@klgates.com, mary.klemz@klgates.com, peggy.mitchell@klgates.com, 16 phong.hong@klgates.com 17 Tim D. Wackerbarth wackerbartht@lanepowell.com, docketing-sea@lanepowell.com, 18 mitchells@lanepowell.com, wallg@lanepowell.com 19 Chris Robert Youtz chris@sylaw.com, matt@sylaw.com, theresa@sylaw.com 20 Richard G Gawlowski gawlowski@wscd.com, ossenkop@wscd.com, reyes@wscd.com 21 Mark J Fucile mark@frllp.com, service@frllp.com, signe@frllp.com 22 Christopher S Marks cmarks@tktrial.com, asbestos.service@tktrial.com, 23 mtiegen@tktrial.com 24 Kevin J Craig kcraig@gordonrees.com, akendrick@grsm.com 25 Mark B Tuvim mtuvim@gordonrees.com, akendrick@gordonrees.com 26 STIPULATION AND PROPOSED ORDER EXTENDING DEADLINE FOR PLAINTIFFS TO SCHROETER, GOLDMARK & BENDER 500 Central Building • 810 Third Avenue • Seattle, WA 98104 RESPOND TO FORD MOTOR COMPANY'S Phone (206) 622-8000 • Fax (206) 682-2305

MOTION FOR SUMMARY JUDGMENT - 4

(Case No. 2:17-cv-00537-JLR)

1 2	Mary P Gaston <u>mgaston@perkinscoie.com</u> , <u>HW Asbestos SEA@perkinscoie.com</u> , <u>docketsea@perkinscoie.com</u> , <u>jstarr@perkinscoie.com</u>			
3	Katherine M. Steele <u>Asbestos@bullivant.com</u> , <u>freida.mason@bullivant.com</u>			
4	Charles W Branham, III <u>tbranham@dobllp.com</u> , jjohnson@dobllp.com			
5	Richard D Ross <u>rross@bbllaw.com</u> , <u>epowell@bbllaw.com</u> , <u>mmadderra@bbllaw.com</u>			
6 7	Jeffrey M Odom <u>odomj@lanepowell.com</u> , <u>carchanoh@lanepowell.com</u> , <u>carrington-dahlk@lanepowell.com</u> , <u>docketing-sea@lanepowell.com</u>			
8	Andrew Gordon Yates <u>yatesa@lanepowell.com</u> , <u>docketing-sea@lanepowell.com</u> , <u>mitchells@lanepowell.com</u>			
9	John G Goller <u>jgoller@vonbriesen.com</u> , <u>jmitten@vonbriesen.com</u> , <u>tdahms@vonbriesen.com</u>			
11 12	Jeanne F Loftis <u>jeanne.loftis@bullivant.com</u> , <u>Asbestos-pdx@bullivant.com</u> , <u>alicia.soine@bullivant.com</u> , <u>portlanddocketing@bullivant.com</u> , <u>stephanie.wilken@bullivant.com</u>			
13 14	Rachel Tallon Reynolds <u>asbestos@bullivant.com</u> , <u>elizabeth.pina@bullivant.com</u> , <u>racheltallon@gmail.com</u> , <u>tonyha.davies@bullivant.com</u>			
15	Thomas J. Breen <u>breen@sgb-law.com</u> , <u>sgbasbestos@sgb-law.com</u>			
16 17	Marc Marshall Carlton <u>marc.carlton@lewisbrisbois.com</u> , <u>Seattle-Asbestos@lewisbrisbois.com</u> , <u>stacey.miller@lewisbrisbois.com</u>			
18	Allen Eraut <u>aeraut@rizzopc.com</u> , <u>recordsmanagement@rizzopc.com</u>			
19	Daniel K. Reising dan@frllp.com, service@frllp.com, signe@frllp.com			
20	Erin P Fraser <u>efraser@tktrial.com</u> , <u>mtiegen@tktrial.com</u>			
22	William D Harvard <u>WDHarvard@ewhlaw.com</u> , <u>kacook@ewhlaw.com</u>			
23	Claude Bosworth <u>cbosworth@rizzopc.com</u> , <u>recordsmanagement@rizzopc.com</u>			
24	Elizabeth Jean McLafferty mclafferty@sgb-law.com, sgbasbestos@sgb-law.com			
25	Brendan Hanrahan <u>brendan.hanrahan@bullivant.com</u>			
26	Kristine E Kruger kkruger@perkinscoie.com, HW Asbestos Sea@perkinscoie.com, STIPULATION AND PROPOSED ORDER EXTENDING DEADLINE FOR PLAINTIFFS TO RESPOND TO FORD MOTOR COMPANY'S MOTION FOR SUMMARY JUDGMENT – 5 (Case No. 2:17-cv-00537-JLR) Kristine E Kruger kkruger@perkinscoie.com, HW Asbestos Sea@perkinscoie.com, SCHROETER, GOLDMARK & BENDER 500 Central Building • 810 Third Avenue • Seattle, WA 98104 Phone (206) 622-8000 • Fax (206) 682-2305			

Case 2:17-cv-00537-JLR Document 574 Filed 07/31/18 Page 6 of 6

1	docketpor@perkinscoie.com, kristinekruger@gmail.com		
2	Malika Johnson <u>mjohnson@tktrial.com</u> , <u>mtiegen@tktrial.com</u>		
3	Lucas W.H. Garrett garrett@sgb-law.com, sgbasbestos@sgb-law.com		
4	Ryan J Groshong <u>ryan.groshong@klgates.com</u> , <u>anita.spencer@klgates.com</u>		
5	Michael Mackenzie Brown <u>mac.brown@bullivant.com</u> , <u>Freida.Mason@bullivant.com</u>		
6 7	Shaun Mary Morgan <u>smorgan@rizzopc.com</u> , <u>recordsmanagement@rizzopc.com</u>		
8	Benjamin H. Adams <u>badams@dobllp.com</u> , <u>case@dobllp.com</u> , <u>dsmith-hogan@dobllp.com</u> <u>jjohnson@dobllp.com</u>		
9	Trevor J. Mohr tmohr@gordonrees.com, seaasbestos@gordonrees.com		
11	Viiu Spangler Khare <u>vspanglerkhare@bcrslaw.com</u> , <u>rcastellanos@bcrslaw.com</u> , <u>tmatsumoto@bcrslaw.com</u>		
12 13	Ryan T Moore <u>rmoore@bcrslaw.com</u> , <u>achohlis@bcrslaw.com</u> , <u>cbee@bcrslaw.com</u> , <u>nlevonyan@bcrslaw.com</u>		
14	Lisa W Shirley <u>LShirley@dobllp.com, dsmith-hogan@dobllp.com</u>		
15	Carrie S Lin clin@mgmlaw.com		
16 17			
18	Robert H Berkes <u>rberkes@bcrslaw.com</u>		
19	<u> </u>		
20	Jospeh S Pevsner Jospeh.Pevsner@tklaw.com		
22	Dated this 31 st day of July, 2018, at Sea	attle, Washington.	
23		Cameron Colbo ameron Colbo, Legal Assistant	
24	So	chroeter, Goldmark & Bender	
25	S	10 Third Avenue, Suite 500 eattle, WA 98104	
26	· ·	206) 622-8000 olbo@sgb-law.com	
	STIPULATION AND PROPOSED ORDER EXTENDING DEADLINE FOR PLAINTIFFS TO RESPOND TO FORD MOTOR COMPANY'S	SCHROETER, GOLDMARK & BENDER 500 Central Building • 810 Third Avenue • Seattle, WA 98104 Phone (206) 622-8000 • Fax (206) 682-2305	

EXTENDING DEADLINE FOR PLAINTIFFS TO RESPOND TO FORD MOTOR COMPANY'S MOTION FOR SUMMARY JUDGMENT - 6

(Case No. 2:17-cv-00537-JLR)